

Application No. 10/041,750  
Amendment dated August 9, 2005  
Response to Office Action of June 10, 2005

Atty. Docket No. 4860P2739  
Examiner An, Shawn S.  
TC/A.U. 2613

## Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. No claims have been amended, added or canceled. Thus, claims 1-15 are pending.

## AMENDMENTS TO THE SPECIFICATION

Paragraph 0030 has been amended to correct a typographical error.

## CLAIM REJECTIONS - 35 U.S.C. § 103(a)

Claims 1-5 and 11-15 were rejected as being unpatentable over U.S. Patent No. 5,657,086 issued to Tahara, et al. (*Tahara*) in view of U.S. Patent No. 5,767,910 issued to Iizuka (*Iizuka*). For at least the reasons set forth below, Applicants submit that claims 1-5 and 11-14 are not rendered obvious by *Tahara* and *Iizuka*.

Claim 1 recites:

performing an encoding transformation on a set of data representing a video frame as frame-based data *and* as field-based data to generate arrays of frame-based data and arrays of field-based data;  
selecting either the arrays of frame-based data or field-based data *based, at least in part, on the number of non-zero coefficients* in the frame-based data and the field-based data; and  
converting an ordering of the arrays of selected data.

Similarly, claim 11 recites:

means for performing an encoding transformation on a set of data representing a video frame as frame-based data and as field-based data to generate arrays of frame-based data and arrays of field-based data;  
means for selecting either the arrays of frame-based data or field-based data *based, at least in part, on the number of non-zero coefficients* in the frame-based data and the field-based data; and  
means for converting an ordering of the arrays of selected data.

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Thus, Applicants claim performing both frame-based transformation and field-based transformation of a video frame. Either the frame-based transformation or the field-based transformation is selected ***based, at least in part, on the number of non-zero coefficients*** in the frame-based transformation and the field-based transformation.

As a preliminary matter, Applicants note that the Office Action does not specifically address the limitation of selecting either the frame-based transformation or the field-based transformation based, at least in part, on the number of non-zero coefficients. In fact, the Office Action does not address or cite any technique for selecting between field-based and frame-based transformation. Therefore, ***the Office Action does not address each and every limitation of the claims.*** Nevertheless, Applicants will address the cited references because it is clear that at least one limitation of the independent claims is lacking in the cited references, whether considered individually or in combination.

*Tahara* discloses:

...encoding picture signals in which ***either*** frame-based orthogonal transformation ***or*** field-based orthogonal transformation is selected using DCT coefficients.

See col. 14, lines 6-9 (emphasis added). Thus, *Tahara* discloses performing either frame-based transformation or field-based transformation, not both. Accordingly, *Tahara cannot* teach or suggest selection of frame-based transformed data or field-based transformed data based, at least in part, on the number of non-zero coefficients in the frame-based transformed data and the field-based transformed data.

*Iizuka* discloses a DCT circuit "having a complicated construction" that is capable of performing frame-based transformations and field-based transformations. Further,

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*Iizuka* discloses two memories, one for the frame-based data and one for the field-based data. See col. 6, lines 1-10. The use of the transformed data is that the macroblocks may be read out of the two memories in different order. *Iizuka* does not disclose a technique for selecting between the field-based and the frame-based transformation.

Because neither *Tahara* nor *Iizuka* discloses or even suggests selection between field-based or frame-based data, no combination of *Tahara* and *Iizuka* can teach or suggest the invention as claimed in claims 1 and 11. Claims 2-5 depend from claim 1. Claims 12-15 depend from claim 11. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 2-5 and 12-15 are not rendered obvious by *Tahara* and *Iizuka* for at least the reasons set forth above.

CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 6-10 were rejected as being unpatentable over *Tahara* in view of *Iizuka* and further in view of U.S. Patent No. 5,737,020 issued to Hall, et al. (*Hall*). For at least the reasons set forth below, Applicants submit that claims 6-10 are not rendered obvious by *Tahara*, *Iizuka* and *Hall*.

The Office Action states that the combination of *Tahara* and *Iizuka*

...discloses all of the claimed subject matter discussed above with the exception of an article of manufacture comprising a software performing all of the claimed subject matter.

See page 3.

As discussed above, no combination of *Tahara* and *Iizuka* can teach or suggest the invention as claimed in claims 1-5 and 11-15. Thus, even if *Hall* discloses an article of manufacture as claimed and the combination is proper, the resulting combination

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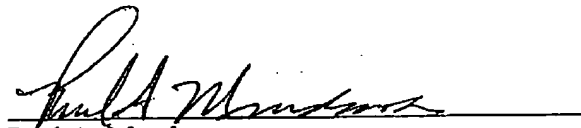
cannot teach or suggest the invention as claimed. Therefore, no combination of *Tahara*, *Iizuka* and *Hall* can teach or suggest the invention as claimed in claims 6-9.

#### CONCLUSION


For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-15 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,  
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